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8 *Attorneys for Defendants Irico Group Corp. and*
9 *Irico Display Devices Co., Ltd.*

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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 IN RE: CATHODE RAY TUBE (CRT)
17 ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

18 This Document Relates to:

19 *ALL INDIRECT PURCHASER ACTIONS*
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**SECOND DECLARATION OF EVAN J.
WERBEL IN SUPPORT OF DEFENDANTS
IRICO GROUP CORP. AND IRICO
DISPLAY DEVICES CO., LTD.'S MOTION
FOR SUMMARY JUDGMENT**

Judge: Honorable Jon S. Tigar

1 I, Evan J. Werbel, declare as follows:

2 1. I am a member of the bar of the District of Columbia and admitted to practice before
3 this Court *pro hac vice*. I am an attorney with Baker Botts L.L.P., which represents Defendants
4 Irico Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display,”
5 collectively, “Irico” or the “Irico Defendants”) in this action. I make this Second Declaration in
6 support of Defendant Irico Group Corporation and Irico Display Devices Co., Ltd.’s Motion for
7 Summary Judgment (the “Motion”). If called as a witness, I could and would testify to the matters
8 set forth in this declaration of my own personal knowledge.

9 2. Attached hereto as Exhibit 75 is a true and correct copy of a letter from John Taladay
10 to Hon. Vaughn R. Walker, dated August 30, 2023 (“Aug. 30 Letter”). The Aug. 30 Letter
11 responded to a letter to the Special Master from Indirect Purchaser Plaintiffs (“IPPs”) dated August
12 22, 2022, in which IPPs suggested that Irico’s summary judgment arguments further supported
13 their alleged prejudice stemming from discovery issues as detailed in their Motion for Sanctions.
14 Though the matter is still properly pending before Judge Walker and not ripe for this Court at this
15 time, Irico is providing the Aug. 30 Letter to illustrate why IPPs’ complaints are without merit.

16 3. Attached hereto as Exhibit 76 is a true and correct copy of excerpts of the deposition
17 of Li Miao, dated March 7-9, 2023 (“Li Dep.”).

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19 I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th
20 day of September, 2023, in Washington, D.C.

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22 /s/ Evan J. Werbel

23 Evan J. Werbel (*pro hac vice*)
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